

**KML LAW GROUP, P.C.**  
**A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA**  
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April 12, 2024

The Honorable Vincent F. Papalia, U.S.B.J.  
Courtroom # 3B  
50 Walnut Street, 3<sup>rd</sup> Floor  
Newark, NJ 07102

RE: Elizabeth M. Convery  
Case No. 22-16516- VFP  
Premises: 455 Lebanon Street, Wyckoff  
Secured Creditor: Rocket Mortgage, LLC f/k/a Quicken Loans, LLC

Dear Judge Papalia,

This office represents Rocket Mortgage, LLC f/k/a Quicken Loans, LLC, (“Secured Creditor”), holder of a mortgage on real property located at 11 Klein Court, Old Tappan, NJ 07675. Please accept this letter in response to Trustee’s motion to sell the subject property.

Secured Creditor has reviewed the current motion to sell and the proposed form of order filed with the Court. Secured Creditor does not object to the motion or the proposed order in its current form. However, should the proposed order be revised, or if the underlying facts supporting the motion should change, including but not limited to the purchase price, Secured Creditor reserves its right to object to the motion.

The total amount owed on the loan thru **April 1, 2024 was approximately \$395,511.96.** The Trustee is required to request an updated formal payoff prior to closing to ensure the loan is paid in full in accordance with the terms of the note, mortgage and applicable state laws. Secured Creditor’s response, in its present form, is not an objection to the current motion to sell the subject property. The undersigned does not intend to appear to prosecute an objection at this time unless

the proposed order is amended to a form deemed objectionable.

Respectfully,  
KML LAW GROUP, P.C.

**/s/ Denise Carlon, Esq.**  
Denise Carlon, Esquire  
dcarlon@kmlawgroup.com  
Attorney for Secured Creditor

**Caption in Compliance with D.N.J. LBR-9004-1**

KML Law Group, P.C.  
By: Denise Carlon Esquire  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
201-549-2363  
Attorneys for Secured Creditor: Rocket  
Mortgage, LLC f/k/a Quicken Loans, LLC

In Re:  
Elizabeth M. Convery a/k/a Elizabeth  
Mooney Convery  
Debtor

Case No: 22-16516 VFP  
Chapter: 13  
Judge: Vincent F. Papalia

**CERTIFICATION OF SERVICE**

1. I, Patricia Rychards:

☐ Represent the \_\_\_\_\_ in the above-captioned matter.

☒ am the secretary/paralegal for Denise Carlon, who represents the Secured Creditor in the above captioned matter.

☐ am the \_\_\_\_\_ in the above case and am representing myself.

2. On 04/15/2024, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Response to Motion to Sell
- Certification of Service

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 04/15/2024

/s/ Patricia Rychards

Name and Address of Party Served	Relation of Party to the Case	Mode of Service
Elizabeth M. Convery a/k/a Elizabeth Mooney Convery 455 Lebanon Street Wyckoff, NJ 07481	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)
Paul Evangelista Aiden Morphy David I. Stevens Scura, Wigfield, Heyer, Stevens & Cammarota, LLP 1599 Hamburg Turnpike Wayne, NJ 07470	Attorneys for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)
Charles M Forman Forman Holt 365 West Passaic Street, Suite 400 Rochelle Park, NJ 07662	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court *)